

Exhibit B

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

IN RE: UBER RIDESHARE CASES)	JCCP Case No: 5188
)	
This Document Relates To:)	Case No. CJC-21-005188
ALL ACTIONS)	Assigned to Hon. Ethan P. Schulman
)	Dept. 304
)	DEFENDANT FACT SHEET
)	
)	

DEFENDANT FACT SHEET

Pursuant to the Order After April 11, 2023 Case Management Conference, entered in the above-captioned litigation on April 11, 2023, a completed Defendant Fact Sheet (“DFS”) shall be provided for each plaintiff. However, if Uber Technologies, Inc. (“Uber”) is unable to identify an account for the plaintiff, Uber will indicate that in response to Question V.1. If Uber is unable to identify an account for a ride connected to the Uber platform that is the alleged basis for the plaintiff’s claims against the Defendants, Uber will indicate that in response to Question I.4, and is not obligated to answer additional questions on the DFS.

Uber must provide information that is true and correct to the best of Your knowledge. You must supplement Your responses if You learn they are incomplete or incorrect in any material respect. In the event the DFS does not provide You with enough space for You to complete Your responses or answers please attach additional sheets. The information in the DFS may, at Your discretion, be provided by reference to the Ride Receipt or other documentation. Please identify any documents that You are producing as responsive to a question or request by bates-stamp identifiers. Please do not leave any questions unanswered or blank.

GENERAL INSTRUCTIONS

This DFS must be completed and served on counsel for the plaintiff as identified on the Notice of Adoption or Short-Form Complaint filed by the plaintiff.

DEFINITIONS

The following definitions shall apply to this DFS:

“You,” “Your” or “Yours” means the responding defendant.

“Plaintiff” means the injured party.

“Subject Trip” means the Uber Ride during which or the result of which Plaintiff is asserting legal claims in the above captioned lawsuit.

“Ride Receipt” means the standard receipt generated by Uber that is related to the Subject Trip, (though the appearance and information on the receipt may vary depending on when the trip occurred).

I. CASE INFORMATION

1. Case Caption: _____
2. Case Number: _____
3. Pseudonym and Real Name (if known): _____

Were You able to identify a ride connected to the Uber platform (Yes/No)?

If the answer to the above question is No, Uber need not answer any of the other questions on this DFS, subject to the instructions above and in Section V below regarding identification of the plaintiff’s account.

II. UBER TRIP INFORMATION

1. Date and Time of the Start of the Subject Trip according to the Ride Receipt:

2. Pickup Location of the Subject Trip according to the Ride Receipt:

3. Dropoff Location of the Subject Trip according to the Ride Receipt:

4. Pickup Location of the Subject Trip (if not reflected in GPS data or Ride Receipt):

5. Dropoff Location of the Subject Trip (if not reflected in GPS data or Ride Receipt):

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6. Date and Time when the Subject Trip ended according to the Ride Receipt:

 7. Please provide the GPS data relating to the Subject Trip.
 8. Please provide the Ride Receipt of the Subject Trip that is maintained by Uber.
 9. Was the ride a Pool Ride (i.e., a ride in which multiple riders requested an Uber ride) (Yes/No):
 10. If Pool Ride, were any other passengers picked up (Yes/No)?
 11. Did Uber obtain statements from anyone about the Subject Trip (Yes/No)?

III. DRIVER INFORMATION

1. Full name of the driver of the Subject Trip according to the Ride Receipt:

2. Was the person driving during the Subject Trip the person identified by Uber on the Ride Receipt (Yes/No)?
3. Is the driver of the Subject Trip still able to access the Uber Driver App (Yes/No)?

If the answer to the above question is “No,” state the date Uber restricted the driver of the Subject Trip’s access to the Uber Driver App.

4. License Plate Number of the vehicle used during the Subject Trip:

5. Driver’s License Number of the Driver of the Subject Trip:

6. Address of the Driver of the Subject Trip as indicated on Driver’s license at time Driver was approved to drive:

7. Last known address of the Driver of the Subject Trip:

8. Date on which Driver mostly recently provided address information to Uber:

9. Date of Birth of the Driver of the Subject Trip: _____

10. Last four digits of the SSN of the Driver of the Subject Trip: _____

11. Was a background check performed on the above driver by a third party
(Yes/No)?

12. Has Uber ever received a formal ticket lodging a complaint from someone, who is
not the Plaintiff, against the Driver for conduct relating to sexual assault or
misconduct as those terms are defined by Raliance (Yes/No)?

If Your answer to the above question is “Yes,” please answer the following.

a. On what date(s) was the report made:

b. What was the category(ies) of conduct-based taxonomy of the alleged
assault(s) or incident(s) as first reported?

13. Has Uber ever received feedback, not through its formal ticket system (e.g., star
rating or comments), from someone, who is not the Plaintiff, regarding an
incident of sexual assault or misconduct, as those terms are defined by Raliance,
involving the Driver (Yes/No)?

If Your answer to the above question is “Yes,” please answer the following.

a. On what date(s) was the report made:

b. What was the category(ies) of conduct-based taxonomy of the alleged
assault(s) or incident(s) as first reported?

14. If Your answer to questions 12 or 13 above is Yes, did Uber restrict the Driver's access to the Uber Driver App as a result of the complaints or feedback described in Your answer to question 12 or 13 (Yes/No)?

If Your answer to the above question is "Yes," on what date(s) was the Driver's access to the Uber Driver App restricted:

IV. **REPORT**

1. Did Plaintiff or someone on Plaintiff's behalf report the alleged assault or incident to You (Yes/No)?

If Your answer to the above question is "Yes," please answer the following.

- a. On what date was the report made:
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- b. What is the name of the person who reported the alleged assault or incident to You?
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- c. What was reported to You, including the category of conduct-based taxonomy of the alleged assault or incident as first reported?
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- d. Did Uber receive a formal ticket lodging a complaint from Plaintiff, or someone on Plaintiff's behalf, against the Driver for conduct relating to sexual assault or misconduct (Yes/No)?

- e. Did Uber receive feedback, not through its formal ticket system (e.g., star rating or comments), from Plaintiff, or someone on Plaintiff's behalf, regarding an incident of sexual assault or misconduct involving the Driver (Yes/No)?

- f. What was that feedback, including the star rating given?
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2. Did you receive any communication from any law enforcement agency regarding the Subject Trip (Yes/No)?

3. Was legal process submitted by any law enforcement agency regarding the Subject Trip (Yes/No)?
4. Did You receive any communication from any law enforcement agency regarding the driver of the Subject Trip (Yes/No)?
5. Was legal process submitted by any law enforcement agency regarding the driver of the Subject Trip (Yes/No)?
6. Did You ever speak with the driver about the alleged assault or incident reported to Uber by any means (Yes/No)?

V. PLAINTIFF INFORMATION

1. Has Uber identified an account for the Plaintiff (Yes/No)?

If Your answer to the above question is “Yes,” please answer the following.

- a. Date of First Ride Pairing: _____
- b. Date of Last Ride Pairing: _____
- c. Total Number of Uber Rides: _____
- d. Has Plaintiff ever been a Driver on the Uber Platform (Yes/No)?

If yes, please provide the following information:

Date of First Ride as a Driver: _____

Date of Last Ride as a Driver: _____

Total Number of Rides as a Driver: _____

Did Uber or a third party perform a background check on the above Plaintiff in the course of Plaintiff trying to gain access to the Driver App (Yes/No)?